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*Counsel for Plaintiff/Counterdefendant*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RESORTS WORLD LAS VEGAS LLC, a  
Delaware limited liability company,

Plaintiff,

v.

ROCK FUEL MEDIA, INC., a California  
corporation,

Defendant.

ROCK FUEL MEDIA, INC., a California  
corporation,

Counterclaimant,

v.

RESORTS WORLD LAS VEGAS LLC, a  
Delaware limited liability company; and DOE  
and ROES I-X are unknown or not yet confirmed,

Counterdefendants.

Case No.: 2:21-cv-02218-JAD-MDC

**STIPULATION AND PROPOSED  
ORDER TO EXTEND PAGE LIMITS  
FOR SUMMARY JUDGMENT  
BRIEFING**

RESORTS WORLD LAS VEGAS, LLC (“Resorts World”) and ROCK FUEL MEDIA, INC.  
 (“Rock Fuel”), by and through their undersigned counsel, hereby jointly move and stipulate to extend  
page limits on the motion for summary judgment briefing pursuant to Local Rule 7-3 for the reasons  
outlined below.

1 This is a trade secret matter. The case centers around whether Rock Fuel disclosed a “trade  
2 secret” or “confidential information” to Resorts World during a September 2018 presentation, and  
3 whether Resorts World subsequently used that alleged trade secret in adopting two apps, one for  
4 sports betting and one that integrates various systems across its property. Resorts World will move  
5 for summary judgment as to liability on July 15, 2025.

6 To provide context for the issue of whether Rock Fuel’s alleged trade secret was readily  
7 ascertainable and/or became publicly known, Resorts World describes the history of certain  
8 technologies in the gaming industry (including what technologies were available, what patents had  
9 issued, and what was being reported in the media and being disclosed at gaming industry events such  
10 as G2E) over the course of many years. *See Exhibit 1*, Rabe Decl., at ¶ 4. Because the alleged trade  
11 secret encompasses a number of concepts in combination, Resorts World seeks to provide explanation  
12 and background regarding these multiple concepts. *Id.* at ¶ 5. Additionally, Resorts World would  
13 like to use certain figures and graphics within the body of its motion, such as figures published in  
14 patent applications, as well as bullet-point lists in their original format. *Id.*, at ¶ 6. For example,  
15 Rock Fuel’s expert report identifies eight elements that, in combination, constitute its trade secret.  
16 Including the full list in Resort World’s motion would take up an entire page if provided for the  
17 Court’s convenience. *Id.* Additionally, other facts are best conveyed clearly by using bullet points.  
18 *Id.*, at ¶ 7. While the relevant facts are not necessarily complicated, they are lengthy. *Id.*, at ¶ 8. The  
19 parties intend to make their respective legal argument sections as concise as possible, but there are  
20 three different claims at issue and one of them (trade secret misappropriation) requires discussion of  
21 various elements in detail. *Id.*, at ¶ 9.

22 //

Counsel for the parties agree that ten (10) additional pages in their initial summary judgment briefs would assist the parties in drafting clear and straightforward briefing in a format that is easy to read for the Court. Likewise, the parties agree that Resorts World will have an additional five (5) pages in reply.

**IT IS SO STIPULATED.**

DATED this 11<sup>th</sup> day of July, 2025.

**GREENBERG TRAURIG, LLP**

*/s/ Bethany L. Rabe*

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*Attorneys for Resorts World Las Vegas*

DATED this 11<sup>th</sup> day of July, 2025.

**SPENCER FANE**

*/s/ Linda K. Williams*

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*Attorneys for Rock Fuel Media, Inc.*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: 7/14/2025

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